



United States Department of Justice

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June 3, 2024

**By ECF**

Hon. Christian F. Hummel  
U.S. Magistrate Judge  
Northern District of New York  
James T. Foley U.S. Courthouse  
445 Broadway  
Albany, New York 12207

**RE: United States v. Kris Roglieri, No. 1:24-CR-261 (CFH)**

Dear Judge Hummel:

Pursuant to Local Criminal Rule 49.2(b), we respectfully submit this letter in support of the government's motion for limited sealing of its letter-motion seeking pretrial detention, which was submitted to Your Honor's chambers, defense counsel, and the U.S. Probation Office yesterday morning by email. The portions of the letter that are subject to the government's limited sealing request reveal the identity of a witness who provided sensitive information to law enforcement and should be therefore be sealed. *See, e.g., United States v. Amodeo*, 71 F.3d 1044, 1050-52 (2d Cir. 1995); *In re Newsday, Inc.*, 895 F.2d 74, 79-80 (2d Cir. 1990). A proposed redacted version of the letter and its exhibits is enclosed with this letter.

Respectfully submitted,

CARLA B. FREEDMAN  
United States Attorney

By: 

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Encl.

cc: AFD Matthew E. Trainor / AFD Jeremy B. Sporn (by ECF)